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May 13, 2022

Via ECF

Hon. Georgette Castner, U.S.D.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

It is so ordered this 18th day
of May, 2022

Georgette Castner, U.S.D.J.

**Re: Laura R. Moretz v. Trustees of Princeton University
No. 3:21-cv-19822-GC-TJB**

Dear Judge Castner:

This firm represents Defendant The Trustees of Princeton University (incorrectly named as "Trustees of Princeton") (the "University"). The University respectfully requests leave to submit supplemental briefing on its motion to dismiss Plaintiff Laura R. Moretz's Complaint (Doc. 19), to address a decision of Judge William J. Martini in *Powell v. Seton Hall University*, 2:21-cv-13709, 2022 WL 1224959 (D.N.J. Apr. 26, 2022), decided one day after the University filed its reply brief. A courtesy copy of *Powell v. Seton Hall University* is attached. While not binding on this Court, Judge Martini granted a motion to dismiss claims for gross negligence and breach of fiduciary duty against another university, Seton Hall, and that decision is instructive here.

If Your Honor approves the University's request to submit supplemental briefing, the University proposes the following briefing schedule: (a) the University's supplemental brief (limited to three, double-spaced pages) will be submitted within seven days of an order approving the University's request; and (b) any response from Plaintiff shall be filed within seven days thereof.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

/s/ James A. Keller

James A. Keller

Encl.

cc: All counsel of record (via ECF)